

DEC 19 1994

FCC MAIL ROOM

ET Docket No. 94-32

## COMMENTS

**Amateur Radio Service for wide-bandwidth intra-city links, digital communications, narrowband and weak signals, Amateur Television, and all manner of new and innovative technologies.**

**5. These bands are required to fully meet FCC Rules Part 97.1(a)-(e), especially public emergency communications, continuation of the amateur's proven ability to contribute to the advancement of the radio art, advancing the skill in both communications and technical phases of the art, expanding the reservoir of trained technicians and electronics experts, and, through the common allocation in ITU Regions 1 and 3 (especially via satellites), continuation and extension of the amateur's unique ability to enhance international goodwill.**

**6. Given the spectrum reality of sharing, and given the fact that the Amateur Service has had a proud history of sharing bandwidth with Government services, I make the following proposals for the FCC to consider:**

- a) Allocate 2300-2310 as Amateur Primary.**
- b) Allocate 2390-2400 with Amateur Primary, Part 15-like spread spectrum and low power secondary.**
- c) Allocate 2400-2450 as ISM, Amateur Secondary, Part 15-like spread spectrum and low power tertiary.**
- d) Allocate 2450-2483.5 as ISM, Amateur Secondary, Part 15-like spread spectrum and low power tertiary.**

**7. This allocation scheme has the following advantages:**

- a) Meets FCC Goals: Benefits American Public by providing for the introduction of new services and enhancement of existing services. The additional 10 MHz of spectrum proposed to be allocated to Part 15.247-like devices on a secondary basis brings the total to 93.5 MHz - a quantity that can be productively used in new and exciting ways.**
- b) In addition, some sort of special 15.249-like rules (very low power, but any modulation scheme) would be most appropriate for high-bandwidth computer LAN connections for this 93.5 Mhz of spectrum.**

- c) The international nature of this allocation at 13cm means that it would be wise for the FCC to coordinate usage of this segment with other countries<sup>1</sup>.
- d) Part 15.247-like and 15.249-like services in the proposed 93.5 MHz would make these frequencies a phenomenally fertile ground for American ingenuity to once again blossom in communications systems.
- e) The fact that companies do not require licenses to operate in this band means that the barriers to product and service entry are lowered.
- f) The fact that 15.247-like and 15.249-like devices would be used also means that the FCC does not need to perform any coordinating function.
- g) The fact that low power would be used also mitigates against excessive EMI exposures.
- h) The fact that the Amateur Radio Service makes an excellent sharing partner.

### **Conclusion**

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In Conclusion, I urge the FCC to:

- a) Allocate 2300-2310 as Amateur Primary.
- b) Allocate 2390-2400 with Amateur Primary, Part 15-like spread spectrum and low power secondary.
- c) Allocate 2400-2450 as ISM, Amateur Secondary, Part 15-like spread spectrum and low power tertiary.
- d) Allocate 2450-2483.5 as ISM, Amateur Secondary, Part 15-like spread spectrum and low power tertiary.

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<sup>1</sup> Imagine how wonderful it would be to, for example, use an American PDA or Laptop in Tokyo or London without requiring a whole new radio when we visit those countries! This is possible with careful allocation of the 13cm band.

**Respectfully Submitted,**

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